

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In Re Application of:	)	
	)	
Diane C. Thornton, et al.	)	Confirmation No: 1176
	)	
Serial No.: 10/729,259	)	Group Art Unit: 2128
	)	
Filed: December 5, 2003	)	Examiner: Gebresilassie, Kibrom K.
	)	
For: DRAWING CONVERSION ASSIGNMENT	)	
AND MANAGEMENT SYSTEM	)	Atty. Docket No.: 190250-1780

**APPEAL BRIEF UNDER 37 C.F.R. § 41.37**

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Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

Sir:

This Appeal Brief under 37 C.F.R. § 41.37 is submitted in support of the Notice of Appeal filed March 11, 2008, responding to the final Office Action mailed December 13, 2007.

It is not believed that extensions of time or fees are required to consider this Appeal Brief. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. §1.136(a), and any fees required therefor are hereby authorized to be charged to Deposit Account No. 20-0778.

### **I. Real Party in Interest**

The real party in interest is AT&T Delaware Intellectual Property Inc., formerly known as BellSouth Intellectual Property Corporation, a Corporation of the State of Delaware, having a place of business at 824 Market Street, Suite 425, Wilmington, DE 19801.

### **II. Related Appeals and Interferences**

There are no known related appeals or interferences that will affect or be affected by a decision in this Appeal.

### **III. Status of Claims**

Claims 1-27 stand finally rejected. No claims have been allowed. The rejections of claims 1-27 are appealed.

### **IV. Status of Amendments**

No amendments have been made subsequent to the final office action mailed December 13, 2007. The claims in the attached Claims Appendix (see below) reflect the present state of Applicants' claims.

### **V. Summary of Claimed Subject Matter**

The claimed subject matter is summarized below with reference numerals and references to the written description ("specification") and drawings. The subject matter

described in the following appears in the original disclosure at least where indicated, and may further appear in other places within the original disclosure.

Claim 1 recites a drawing conversion management and assignment system. The system comprises receiving logic of a computer system (shown, *e.g.*, as 120 in Fig. 1B) operable to receive notification of completion of a land base drawing file that is associated with a plat corresponding to a parcel of land represented by the land base drawing file. See, *e.g.*, Applicants' specification, page 25, lines 13-16. The system further comprises a database (shown, *e.g.*, as 165 in Fig. 1B) coupled to the receiving logic, operable to create a drawing conversion job record associated with the completed land base drawing file, described, *e.g.*, in Applicants' specification, page 3, lines 9-13, where the drawing conversion job record indicates that the plat corresponding to the completed land base drawing file is tasked to be converted into a new drawing format. See, *e.g.*, Applicants' specification, pages 23-24, lines 23-3. Assignment logic of the computer system (shown, *e.g.*, as 120 in Fig. 1B) is coupled to the database (shown, *e.g.*, as 165 in Fig. 1B) and is operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment. See, *e.g.*, Applicants' specification, page 20, lines 19-21. The drawing conversion job involves creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file. See, *e.g.*, Applicants' specification, pages 23-24, lines 23-3 and page 24, lines 18-23. The system further comprises completion logic of the computer system (shown, *e.g.*, as 120 in Fig. 1B) coupled to the database (shown, *e.g.*, as 165 in Fig. 1B) and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct

the database (shown, *e.g.*, as 120 in Fig. 1B) to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format. See, *e.g.*, Applicants' specification, page 17, lines 21-24.

Claim 10 recites a method for assigning and managing drawing conversions. The method comprises receiving notification that a land base drawing file is available, where the land base drawing file is associated with a wirecenter and is a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format. See, *e.g.*, Applicants' specification, pages 23-24, lines 23-3 and page 25, lines 13-16. The method further comprises creating a drawing conversion job record associated with the available land base drawing file, as described *e.g.*, in Applicants' specification, page 3, lines 9-13, where the drawing conversion job involves creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file. See, *e.g.*, Applicants' specification, pages 23-24, lines 23-3 and page 24, lines 18-23. The method also comprises storing the drawing conversion job record in a database (shown, *e.g.*, as 165 in Fig. 1B), as described, *e.g.*, in Applicants' specification, page 3, lines 22-23; assigning the drawing conversion job record to a draftsman, as described, *e.g.*, in Applicants' specification, page 3, lines 23-24; recording the assignment of the drawing conversion job record in the database, as described, *e.g.*, in Applicants' specification, pages 3-4, lines 24-1; and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database (shown,

e.g., as 165 in Fig. 1B). See, e.g., Applicants' specification, page 4, lines 1-2 and page 17, lines 21-24.

Claim 19 recites a computer readable medium being a tangible medium and having a program for assigning and managing drawing conversions. See, e.g., Applicants' specification, page 15, lines 14-17. The program comprises instructions that when executed by a computer causes the computer to receive notification that a land base drawing file is available, where the land base drawing file is associated with a wirecenter and is a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format. See, e.g., Applicants' specification, pages 23-24, lines 23-3 and page 25, lines 13-16. The program also creates a drawing conversion job record associated with the available land base drawing file, as described e.g., in Applicants' specification, page 3, lines 9-13, where the drawing conversion job involves creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file. See, e.g., Applicants' specification, pages 23-24, lines 23-3 and page 24, lines 18-23. The program further causes the computer to store the drawing conversion job record in a database (shown, e.g., as 165 in Fig. 1B), as described, e.g., in Applicants' specification, page 3, lines 22-23; assign the drawing conversion job record to a draftsman, as described, e.g., in Applicants' specification, page 3, lines 23-24; record the assignment of the drawing conversion job record in the database (shown, e.g., as 165 in Fig. 1B), as described, e.g., in Applicants' specification, pages 3-4, lines 24-1; and close the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing

conversion job record as closed in the database (shown, e.g., as 165 in Fig. 1B). See, e.g., Applicants' specification, page 4, lines 1-2 and page 17, lines 21-24.

## **VI. Grounds of Rejection to be Reviewed on Appeal**

The following grounds of rejections are to be reviewed on appeal:

Claims 1-9 and 19-27 have been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter.

Claims 1-27 stand rejected under 35 U.S.C. § 102(e) as allegedly being unpatentable by *Chauhan* (U.S. Patent Application Publication No. 2004/0236620 A1).

## **VII. Arguments**

The Appellant respectfully submits that Applicant's claims 1-27 are patentable. The Appellant respectfully requests that the Board of Patent Appeals overturn the rejection of those claims at least for the reasons discussed below.

### **A. Response to Rejections of Claims 1-9 under 35 U.S.C. § 101**

Claims 1-9 have been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. The Office Action issued July 5, 2007 alleges that "receiving logic, a database, assignment logic, and completion logic are just program per se" and are not physical components required for a system claim. Page 3. Applicants respectfully traverse the rejection.

The Office Action issued July 5, 2007 states that "receiving logic, a database, assignment logic, and completion logic" are programs per se which is not an accurate

depiction. To say that something is “per se” a program means to say that it is inherently a software program. This is not true with regard to a database, for example. Further, in the Office Action, it acknowledges that logic may be defined as an arrangement of circuit elements, as an example. Page 2. Therefore, to construe logic “of a computer system,” or a database, as recited in the claims, to be software *per se* is improper.

Further, MPEP 2106 states that statutory subject matter may be characterized by structural and functional interrelationships between an element of a computer and other elements of the computer. Accordingly, claim 1, as presently presented, recites that receiving logic of a computer system is coupled to a database, where the database is coupled to other logic components of the computer system which are interacting with a user of the computer system (“draftsman”). Moreover, Applicants respectfully submit that independent claim 1 calls for a computer to implement the method and achieves a useful, concrete, and tangible result. For at least these reasons, claims 1-9 are directed to statutory subject matter. Therefore, reversal of the rejections of claims 1-9 is respectfully requested.

B. Response to Rejections of Claims 19-27 under 35 U.S.C. § 101

Claims 19-27 have been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In the Office Action issued December 13, 2007, the Examiner points out that the specification states that a computer-readable medium could be paper “upon which the program is printed, as the program can be electronically captured, via for instance optical scanning of the paper or other medium, then compiled, interpreted or otherwise processed in a suitable manner if necessary,

and then stored in a computer memory.” Applicants’ specification, page 16, lines 10-15. On this basis, the Examiner asserts that claims 19-27 may cover paper which has been held to be non-statutory subject matter.

In response, Applicants note that independent claim 19 recites a “computer readable medium being a tangible medium and having a program for assigning and managing drawing conversions, the program comprising instructions that when executed by a computer causes the computer to perform . . . .” Therefore, the claimed computer readable medium has a program comprising instructions executed by a computer and does not describe the program being electronically captured, compiled, interpreted or otherwise processed and stored in a computer memory, as is described for a medium like paper. Therefore, claims 19-27 should not be construed to cover a paper medium. Applicants respectfully submit that claims 19-27 are directed to statutory subject matter and respectfully request a reversal of the rejections.

C. Response to Rejections of Claims 1-27 under 35 U.S.C. § 102(e)

Claims 1-27 stand rejected under 35 U.S.C. § 102(e) as allegedly being unpatentable by *Chauhan* (U.S. Patent Application Publication No. 2004/0236620 A1). For a proper rejection of a claim under 35 U.S.C. § 102, the cited reference must disclose all elements/features/steps of the claim. See, e.g., *E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 USPQ2d 1129 (Fed. Cir. 1988).

1. The *Chauhan* Disclosure

*Chauhan* describes an “automated management system for managing data, outage repair, load switching, job workflow and crew dispatching, crew workflow,



installation, maintenance and restoration of utility services by integrating geographic information systems (GIS) data with many other data sources so as to gather, transform, manipulate, analyze, and produce desired information for continuously supplying utility and relevant services. The data sources include customer information systems (CIS) and billing data, interactive voice recognition (IVR) call management data, supervisory control and data acquisition (SCADA), mobile crew management (MCM) data, automatic meter reading (AMR) data, automated vehicle location (AVL) data, engineering analysis data supported by 3<sup>rd</sup> party software packages (such as load monitoring and balancing), etc. In particular, the system allows an on-site engineer to retrieve data (ex. field maps, work orders, codes) or enter, via a portable device, inspection data (ex. such as poles or underground facilities, code violations).” Para. 0002 and *see also* para. 0081.

As such, *Chauhan* does not describe a drawing conversion management where a workflow of redrawing a plat for a parcel of land from an old format into a new format is tracked by a drawing conversion and assignment management system, which includes creation of the land base drawing file which is to be used to in making the new drawing, receiving notification of creation of this land base drawing file, creating a drawing conversion job record, assigning the job record to a draftsman, and then receiving a request to close the job after the job is completed by the draftsman. Rather, *Chauhan* describes a process for opening, monitoring, and closing work orders from customers and not a system for converting drawings from an old format into a new format involving the work of a draftsman.

## 2. Applicants' Claims 1-9

As provided in independent claim 1, Applicants claim:

A drawing conversion management and assignment system, comprising:

receiving logic of a computer system operable to receive notification of completion of a land base drawing file that is associated with a plat corresponding to a parcel of land represented by the land base drawing file;

a database coupled to the receiving logic, operable to create a drawing conversion job record associated with the completed land base drawing file, the drawing conversion job record indicating that the plat corresponding to the completed land base drawing file is tasked to be converted into a new drawing format;

***assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file; and***

***completion logic of the computer system coupled to the database and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format.***

(Emphasis added).

Claim 1 is patentable over *Chauhan* for at least the reason that *Chauhan* fails to teach or suggest all of the claimed features described above, such as "assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file; and completion logic of the computer system coupled to the database and operable to receive a request to close

the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format,” as emphasized above.

For example, as described above, *Chauhan* describes an “automated management system for managing data, outage repair, load switching, job workflow and crew dispatching, crew workflow, installation, maintenance and restoration of utility services by integrating geographic information systems (GIS) data with many other data sources so as to gather, transform, manipulate, analyze, and produce desired information for continuously supplying utility and relevant services. The data sources include customer information systems (CIS) and billing data, interactive voice recognition (IVR) call management data, supervisory control and data acquisition (SCADA), mobile crew management (MCM) data, automatic meter reading (AMR) data, automated vehicle location (AVL) data, engineering analysis data supported by 3<sup>rd</sup> party software packages (such as load monitoring and balancing), etc. In particular, the system allows an on-site engineer to retrieve data (ex. field maps, work orders, codes) or enter, via a portable device, inspection data (ex. such as poles or underground facilities, code violations).” Para. 0002 and see also para. 0081.

As such, *Chauhan* does not describe a drawing conversion management system where a workflow of redrawing a plat for a parcel of land from an old format into a new format is tracked by a drawing conversion and assignment management system, which includes creation of the land base drawing file which is to be used to in making the new drawing, receiving notification of creation of this land base drawing file, creating a drawing conversion job record, assigning the job record to a draftsman, and then

receiving a request to close the job after the job is completed by the draftsman. Rather, *Chauhan* describes a process for opening, monitoring, and closing work orders from customers and not a system for converting drawings from an old format into a new format involving the work of a draftsman. Accordingly, *Chauhan* fails to teach or suggest at least “assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file; and completion logic of the computer system coupled to the database and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format,” as recited in claim 1.

The previous Office Actions cite passages from the *Chauhan* reference which describe assigning a work order to a field engineer where GIS features and sketches may be received as part of the work order. See para. 0081. *Chauhan* also describes that as part of a work order, some personnel may have to draw proposed work such as system improvements, right of way jobs, or other suggested changes. See para. 0121. The foregoing fails to teach or suggest all of the features of claim 1, such as “receiving logic of a computer system operable to receive notification of completion of a land base drawing file that is associated with a plat corresponding to a parcel of land represented by the land base drawing file,” “creat[ing] a drawing conversion job record associated with the completed land base drawing file, the drawing conversion job record indicating

that the plat corresponding to the completed land base drawing file is tasked to be converted into a new drawing format,” “assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file,” and “completion logic of the computer system coupled to the database and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format,” as recited in claim 1.

Hence, claim 1 is not anticipated by *Chauhan*, and the rejection should be overturned. Further, since claims 2-9 depend from claim 1 and recite additional features, claims 2-9 are allowable as a matter of law over the cited art.

### 3. Applicants' Claims 10-18

As provided in independent claim 10, Applicants claim:

A method for assigning and managing drawing conversions, comprising:

***receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format;***

***creating a drawing conversion job record associated with the available and base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file;***

***storing the drawing conversion job record in a database;***

***assigning the drawing conversion job record to a draftsman;***

***recording the assignment of the drawing conversion job record in the database; and***

***closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.***

(Emphasis added).

Claim 10 is patentable over *Chauhan* for at least the reason that *Chauhan* fails to teach or suggest all of the claimed features described above, such as “receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format; creating a drawing conversion job record associated with the available and base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job record to a draftsman; recording the assignment of the drawing conversion job record in the

database; and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database,” as emphasized above.

For example, *Chauhan* describes an “automated management system for managing data, outage repair, load switching, job workflow and crew dispatching, crew workflow, installation, maintenance and restoration of utility services by integrating geographic information systems (GIS) data with many other data sources so as to gather, transform, manipulate, analyze, and produce desired information for continuously supplying utility and relevant services. The data sources include customer information systems (CIS) and billing data, interactive voice recognition (IVR) call management data, supervisory control and data acquisition (SCADA), mobile crew management (MCM) data, automatic meter reading (AMR) data, automated vehicle location (AVL) data, engineering analysis data supported by 3<sup>rd</sup> party software packages (such as load monitoring and balancing), etc. In particular, the system allows an on-site engineer to retrieve data (ex. field maps, work orders, codes) or enter, via a portable device, inspection data (ex. such as poles or underground facilities, code violations).” Para. 0002 and see *also* para. 0081.

As such, *Chauhan* does not describe a method for assigning and managing drawing conversions from the receipt of a land base drawing file associated with a wirecenter to the creation of a drawing conversion job record for the redrawing of a prior plat to the assignment of the job to a draftsman to the closing of the job by the draftsman. Rather, *Chauhan* describes a process for opening, monitoring, and closing work orders from customers and not a system for converting drawings from an old

format into a new format involving the work of a draftsman. Accordingly, *Chauhan* fails to teach or suggest at least “receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format; creating a drawing conversion job record associated with the available and base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job record to a draftsman; recording the assignment of the drawing conversion job record in the database; and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database,” as recited in claim 10.

The previous Office Actions cite passages from the *Chauhan* reference which describe assigning a work order to a field engineer where GIS features and sketches may be received as part of the work order. See para. 0081. *Chauhan* also describes that as part of a work order, some personnel may have to draw proposed work such as system improvements, right of way jobs, or other suggested changes. See para. 0121. The foregoing fails to teach or suggest all of the features of claim 10, such as “creating a drawing conversion job record associated with the available land base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job



record to a draftsman . . . and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.”

Hence, claim 10 is not anticipated by *Chauhan*, and the rejection should be overturned. Further, since claims 11-18 depend from claim 10 and recite additional features, claims 11-18 are allowable as a matter of law over the cited art.

#### 4. Applicants' Claims 19-27

As provided in independent claim 19, Applicants claim:

A computer readable medium being a tangible medium and having a program for assigning and managing drawing conversions, the program comprising instructions that when executed by a computer causes the computer to perform:

***receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format;***

***creating a drawing conversion job record associated with the available land base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file;***

***storing the drawing conversion job record in a database;***

***assigning the drawing conversion job record to a draftsman;***

***recording the assignment of the drawing conversion job record in the database; and***

***closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.***

(Emphasis added).

Claim 19 is patentable over *Chauhan* for at least the reason that *Chauhan* fails to teach or suggest all of the claimed features described above, such as “receiving

notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format; creating a drawing conversion job record associated with the available and base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job record to a draftsman; recording the assignment of the drawing conversion job record in the database; and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database,” as emphasized above.

For example, *Chauhan* describes an “automated management system for managing data, outage repair, load switching, job workflow and crew dispatching, crew workflow, installation, maintenance and restoration of utility services by integrating geographic information systems (GIS) data with many other data sources so as to gather, transform, manipulate, analyze, and produce desired information for continuously supplying utility and relevant services. The data sources include customer information systems (CIS) and billing data, interactive voice recognition (IVR) call management data, supervisory control and data acquisition (SCADA), mobile crew management (MCM) data, automatic meter reading (AMR) data, automated vehicle location (AVL) data, engineering analysis data supported by 3<sup>rd</sup> party software packages (such as load monitoring and balancing), etc. In particular, the system allows an on-site engineer to retrieve data (ex. field maps, work orders, codes) or enter, via a

portable device, inspection data (ex. such as poles or underground facilities, code violations).” Para. 0002 and see *also* para. 0081.

As such, *Chauhan* does not describe a computer readable medium having a program for assigning and managing drawing conversions from the receipt of a land base drawing file associated with a wirecenter to the creation of a drawing conversion job record for the redrawing of a prior plat to the assignment of the job to a draftsman to the closing of the job by the draftsman. Rather, *Chauhan* describes a process for opening, monitoring, and closing work orders from customers and not a system for converting drawings from an old format into a new format involving the work of a draftsman. Accordingly, *Chauhan* fails to teach or suggest at least ““receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format; creating a drawing conversion job record associated with the available and base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job record to a draftsman; recording the assignment of the drawing conversion job record in the database; and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database,” as recited in claim 19.

The previous Office Action cite passages from the *Chauhan* reference which describe assigning a work order to a field engineer where GIS features and sketches

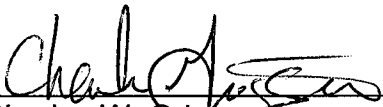
may be received as part of the work order. See para. 0081. *Chauhan* also describes that as part of a work order, some personnel may have to draw proposed work such as system improvements, right of way jobs, or other suggested changes. See para. 0121. The foregoing fails to teach or suggest all of the features of claim 19, such as “creating a drawing conversion job record associated with the available land base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file . . . assigning the drawing conversion job record to a draftsman . . . and closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.”

Hence, claim 19 is not anticipated by *Chauhan*, and the rejection should be overturned. Further, since claims 20-27 depend from claim 19 and recite additional features, claims 20-27 are allowable as a matter of law over the cited art.

### **VIII. Conclusion**

In summary, it is Applicants' position that Applicants' claims are patentable over the applied cited art references and that the rejection of these claims should be overturned. Appellant therefore respectfully requests that the Board of Appeals overturn the Examiner's rejection and allow Applicants' pending claims.

Respectfully submitted,

By:   
Charles W. Griggers  
Registration No. 47,283

**Claims Appendix under 37 C.F.R. § 41.37(c)(1)(viii)**

The following are the claims that are involved in this Appeal.

1. A drawing conversion management and assignment system, comprising:  
receiving logic of a computer system operable to receive notification of completion of a land base drawing file that is associated with a plat corresponding to a parcel of land represented by the land base drawing file;  
a database coupled to the receiving logic, operable to create a drawing conversion job record associated with the completed land base drawing file, the drawing conversion job record indicating that the plat corresponding to the completed land base drawing file is tasked to be converted into a new drawing format;  
assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file; and  
completion logic of the computer system coupled to the database and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format.
2. The system of claim 1, wherein the database is operable to store a plurality of drawing conversion job records.

3. The system of claim 2, further comprising:  
reporting logic coupled to the database, operable to enable any of a plurality of users to view the drawing conversion job record.

4. The system of claim 3, wherein the reporting logic is further operable to provide a summary report of a plurality of available drawing conversion job records, assigned drawing conversion job records, and complete drawing conversion job records.

5. The system of claim 3, wherein the reporting logic is further operable to enable any of a plurality of users to view a plurality of assigned drawing conversion job records.

6. The system of claim 3, wherein the reporting logic is further operable to enable any of a plurality of users to view a plurality of completed drawing conversion job records.

7. The system of claim 1, wherein the land base drawing file is provided by a regional land administration center.

8. The system of claim 7, wherein the land base drawing file is in an engineering work order format.

9. The system of claim 1, wherein the drawing conversion job record includes an availability date, wirecenter location information, a completed date, a quartile assignment, and a fiber units allocation.

10. A method for assigning and managing drawing conversions, comprising:  
receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format;

creating a drawing conversion job record associated with the available land base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file;

storing the drawing conversion job record in a database;

assigning the drawing conversion job record to a draftsman;

recording the assignment of the drawing conversion job record in the database;

and

closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.

11. The method of claim 10, further comprising storing a plurality of drawing conversion job records in the database.



12. The method of claim 11, further comprising providing a report comprising details for at least the plurality of drawing conversion job records in the database.

13. The method of claim 11, further comprising providing a summary report of a plurality of available drawing conversion job records, assigned drawing conversion job records, and complete drawing conversion job records.

14. The method of claim 11, further comprising providing a plurality of unassigned drawing conversion job records to a plurality of users.

15. The method of claim 11, further comprising providing a plurality of completed drawing conversion job records to a plurality of users.

16. The method of claim 10, wherein the land base drawing file and notification are provided by a regional land administration center.

17. The method of claim 16, wherein the land base drawing file is in an engineering work order format.

18. The method of claim 10, wherein the drawing conversion job record includes an availability date, wirecenter location information, a completed date, a quartile assignment, and a fiber units allocation.

19. A computer readable medium being a tangible medium and having a program for assigning and managing drawing conversions, the program comprising instructions that when executed by a computer causes the computer to perform:

receiving notification that a land base drawing file is available, the land base drawing file being associated with a wirecenter and being a basis for redrawing a plat corresponding to the wirecenter and the land base drawing file into a new drawing format;

creating a drawing conversion job record associated with the available land base drawing file, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the wirecenter represented by the land base drawing file;

storing the drawing conversion job record in a database;

assigning the drawing conversion job record to a draftsman;

recording the assignment of the drawing conversion job record in the database;

and

closing the job upon receipt of a close request from the draftsman to indicate that the plat has been redrawn in the new drawing format, by marking the drawing conversion job record as closed in the database.

20. The program of claim 19, further comprising storing a plurality of drawing conversion job records in the database.

21. The program of claim 20, further comprising providing a report comprising details for at least the plurality of drawing conversion job records in the database.

22. The program of claim 20, further comprising providing a summary report of a plurality of available drawing conversion job records, assigned drawing conversion job records, and complete drawing conversion job records.

23. The program of claim 20, further comprising providing a plurality of unassigned drawing conversion job records to a plurality of users.

24. The program of claim 20, further comprising providing a plurality of completed drawing conversion job records to a plurality of users.

25. The program of claim 19, wherein the land base drawing file and notification are provided by a regional land administration center.

26. The program of claim 25, wherein the land base drawing file is in an engineering work order format.

27. The program of claim 19, wherein the drawing conversion job record includes an availability date, wirecenter location information, a completed date, a quartile assignment, and a fiber units allocation.

**Evidence Appendix under 37 C.F.R. § 41.37(c)(1)(ix)**

There is no extrinsic evidence to be considered in this Appeal. Therefore, no evidence is presented in this Appendix.

**Related Proceedings Appendix under 37 C.F.R. § 41.37(c)(1)(x)**

There are no related proceedings to be considered in this Appeal. Therefore, no such proceedings are identified in this Appendix.